

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5507

Rachel Perillo

September 7, 2023

By ECF – Ex Parte

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: United States v. Julio Marin Gonzalez
23 Cr. 180 (KPF)

Dear Judge Failla:

I represent Julio Marin Gonzalez, the defendant in the above-referenced matter, having been appointed on April 17, 2023 pursuant to the Criminal Justice Act. This letter is respectfully submitted to request that your Honor authorize the appointment of my associate, Rachel Perillo, Esq., as associate counsel in this matter to assist me in various aspects of the case which are described in further detail below.¹

Ms. Perillo is a 2014 New York Law School graduate and is admitted to practice before this Court. She regularly assists me and other partners in my law office in CJA cases and has been assigned as associate counsel in criminal matters in the Southern and Eastern Districts of New York. Her assistance will be needed in Mr. Marin Gonzalez's case for various reasons. This is a complex matter involving an international drug trafficking conspiracy out of Mexico. There are multiple defendants, many of whom have not yet been extradited to the Southern District of New York. Given the number of defendants and the complex nature of the offense it is expected that that discovery will be voluminous. Ms. Perillo's assistance will be needed to help review discovery and to maintain communication with Mr. Gonzalez, including visiting with him at the Metropolitan Detention Center.

¹ Ms. Perillo appeared at Mr. Gonzalez's arraignment on April 20, 2023 during which your Honor orally appointed her as an associate attorney in this matter. However, because Ms. Perillo is not on the Criminal Justice Act Panel we seek the Court's authorization for CJA compliance purposes.

If the Court grants this application, it is requested that Ms. Perillo be approved at the CJA rate of \$120.00 per hour for a period of 100 hours, nunc pro tunc to April 19, 2023. Should additional hours be sought, an application will be submitted to the Court seeking approval.

The Court's time and attention to this matter is appreciated.

Respectfully submitted,
/s/
Jeremy Schneider

Counsel is directed to submit a voucher pursuant to the Criminal Justice Act eVoucher system.

The Clerk of Court is directed to terminate the pending motion at docket number 42.

Dated: September 7, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE